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1   don't have an email like that, so...
2   A.   Oh, okay.
3   Q.   I'd just ask that you go back and
4   check.
5   You mentioned that you have four
6   children.
7   Did they go to Temple for college?
8   A.   All of them went. Two graduated.
9   Q.   Who graduated?
10   A.   Anne Elizabeth Briggs-Fandek, and
11   Zachary Briggs-Fandek.
12   Q.   Why did your two other children not
13   graduate?
14   A.   Uhm, one was in an automobile
15   accident and was injured seriously. And the
16   other one changed, did something, decided
17   she wanted to do something else.
18   Q.   What did the other one decide to do?
19   A.   She got, uhm, her, her beautician
20   license.
21   Q.   During the time that your children
22   were enrolled at Temple, did you receive a
23   discount on tuition?
24   A.   Tuition remission.

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1   Q.   What does that mean?
2   A.   Uhm, it pays for full tuition.
3   Q.   So you did not have to pay tuition
4   for your children --
5   A.   No, I did --
6   Q.   -- to attend Temple?
7   A.   No, I did not.
8   Q.   Uhm, in 2014, were any of your
9   children enrolled at Temple?
10   A.   My, my youngest, yes.
11   Q.   And who's that?
12   A.   Zachary.
13   Q.   When did Zachary graduate from
14   Temple?
15   A.   He graduated that May.
16   Q.   May of 2014?
17   A.   Uh-huh.
18   Q.   Is that correct? Yes?
19   A.   Yes, it is.
20   Q.   Did you have to pay for any part of
21   his tuition?
22   A.   No, I did not.
23   Q.   Was the tuition remission an
24   important -- was it important to you?

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1   A.   Yes. It's a wonderful benefit.
2   Q.   And so it's something you wanted to
3   keep so that your children could have it
4   without having to pay for school; is that
5   accurate?
6   A.   That is accurate.
7   Q.   Ms. Briggs, are you currently
8   employed?
9   A.   Yes, I am.
10   Q.   Where do you work?
11   A.   I work for, uhm, it's called,
12   "Liberty Home Health."
13   Q.   What do you do there?
14   A.   I am a home health aide.
15   Q.   Do you work in other people's homes
16   or at a location?
17   A.   I work at one woman's home.
18   Q.   One person?
19   A.   Uh-huh, yes.
20   Q.   Is that in Philadelphia?
21   A.   Yes, it is.
22   Q.   When did you start that job?
23   A.   In August. I don't have an exact
24   date. August of last year.

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1   Q.   So August of 2016?
2   A.   Yes.
3   Q.   How did you learn about that job?
4   A.   A friend of mine told me about it,
5   who's her neighbor.
6   Q.   How much are you paid?
7   A. $10.50 an hour.
8   Q.   How many hours a week do you work?
9   A.   Forty.
10   Q.   Did you ever work more than 40 hours?
11   A.   Sometimes I do.
12   Q.   Are you paid overtime --
13   A.   No, I am not.
14   Q.   -- for the hours you work over 40?
15   A.   Only if it's a holiday.
16   Q.   Do you have any other employment at
17   the present time other than at Liberty Home
18   Health?
19   A.   No, I do not.
20   Q.   Why do you not have any other
21   employment?
22   A.   Because I cannot find it.
23   Q.   Are you looking?
24   A.   I've pretty much stopped now. I have

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1 a job.
2 Q.   So you've stopped looking for other
3 employment since you obtained employment
4 with Liberty Home Health in August of 2016?
5 A.   Yes.
6 Q.   Is there anywhere else that you've
7 worked since the end of your employment at
8 Temple other than Liberty Home Health?
9 A.   No.
10 Q.   Did you work for the School District
11 of Philadelphia?
12 A.   I was hired, but I didn't -- I had to
13 change -- they changed, uhm, headhunters.
14 It went from Resource for Teachers to Kelly,
15 and Kelly required us to do this
16 orientation. And I already had the job, was
17 offered the other job, and it was 40 hours a
18 week. Substitute teaching was not. It was
19 catch-as-catch-can, so --
20 Q.   And so --
21 A.   And it wasn't that -- wasn't even
22 anything more, money.
23 Q.   Okay. And how much were you going to
24 be paid for the substitute teaching?

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1 A.   It was $75 a day.
2 Q.   And was there any guarantee about the
3 number of days?
4 A.   No guarantee.
5 Q.   And you did not attend the
6 orientation; is that right?
7 A.   I, I went to the first one.
8 Q.   Okay. Were there subsequent programs
9 that you had to attend?
10 A.   When they changed, when they changed,
11 uhm, employment agencies to Kelly, they
12 required it. But I had already accepted the
13 other position.
14 Q.   And so you did not attend the
15 required Kelly orientation, correct?
16 A.   No.
17 Q.   Any other employment that you've had
18 since the end of your employment at Temple?
19 A.   No.
20 Q.   Have you had any other sources of
21 income since the end of your employment at
22 Temple other than your, your wages from
23 Liberty Home Health and Unemployment
24 Compensation?

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1 A.   Uhm, I had some money in my
2 retirement fund that I had to draw down to
3 live.
4 Q.   How much?
5 A.   Since 2014, uhm, it was like $25,000
6 each year.
7 Q.   So is it a hundred-thousand total or
8 is it -- you said 25,000 each year, so did
9 you withdraw 25,000 in 2014?
10 A.   I have 20,000 left in it, so, yes,
11 about that, yeah.
12 Q.   So you withdrew 25,000 in 2014,
13 25,000 in 2015; is that correct?
14 A.   About, yes.
15 Q.   And about 20 --
16 A.   And nothing --
17 Q.   About 25,000 in 2016?
18 A.   Yeah, yes, yeah.
19 Q.   And did you withdraw about $25,000 in
20 2017?
21 A.   There's no, there's no money
22 that's -- it's, it's not liquid, so I can't
23 get to it.
24 Q.   Okay. So you have not withdrawn

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1 money from that fund since 2016; is that
2 accurate?
3 A.   There was one in January.
4 Q.   Of 2017?
5 A.   Of 2017. And that's --
6 Q.   For how much?
7 A.   -- after that -- it was 2,000, I
8 think. And that's when they told me the
9 rest of it was not liquid.
10 Q.   Other than the job you applied for at
11 Liberty Home Health and with Philadelphia
12 School District, you mentioned a job that
13 you applied for at Philadelphia Community
14 College?
15 A.   Uh-huh, yes.
16 Q.   And what was that job?
17 A.   It was -- the title was -- I don't --
18 it was similar to the job I did at the
19 dean's office. I think it was
20 "administrative specialist" was the title,
21 and it was working in the dean's office in
22 the School of -- I would be working with the
23 History Department. I guess that's -- I
24 don't know what depart -- I don't know what

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1   department/school that was.
2   I had an interview with that one.
3   Q.   And after the interview, did you
4   receive an offer?
5   A.   I did not.
6   Q.   Did they told (sic) you that they had
7   hired somebody else for the job?
8   A.   Uhm, I don't recall. They just sent
9   me a letter saying that -- yeah, yeah,
10 someone. They found another candidate,
11 yeah.
12 Q.   Did they tell you why you didn't get
13 the job?
14 A.   They did not.
15 Q.   Uhm, other than those three jobs,
16 have you applied for any other jobs other
17 than the jobs you applied for at Temple,
18 which we'll go through, since the end of
19 your employment at Temple?
20 A.   Many.
21 Q.   Okay. What other jobs -- well, let
22 me ask you something else.
23   How have you applied for other jobs?
24 A.   Well, some I -- the people who would

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1   let me walk in and apply, I did.
2   Q.   Okay.
3   A.   Uhm, other places wouldn't, and I had
4   to do it online.
5   Q.   So, we'll put on the record that I
6   have no records of your job applications.
7   A.   Yeah. You don't have records?
8   Q.   And so rather than go through that
9   today --
10 A.   Okay.
11 Q.   -- we'll come back another day --
12 A.   Okay.
13 Q.   -- when we do have your job
14 applications and go through that, because I
15 think that will be --
16 A.   The confirmation letters, okay.
17 Q.   Sure. I think that will be an easier
18 way --
19 A.   Okay.
20 Q.   -- to do things.
21 A.   All right.
22 Q.   Okay?
23 A.   (Witness nods head.)
24 Q.   Do you have records of the jobs that

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1   you've applied for online?
2   A.   Yes, I do.
3   Q.   Did you use search engines?
4   A.   I did.
5   Q.   Which ones?
6   A.   I used -- you mean job search
7   engines?
8   Q.   Yes.
9   A.   Like, uhm, I used LinkedIn; I used,
10 uhm, ZipRecruiter; Monster; but then I --
11 mostly I went to direct websites to look for
12 openings.
13 Q.   And you would have confirmation
14 emails --
15 A.   Yes.
16 Q.   -- from any jobs you applied for?
17 A.   Yes, I did, uh-huh.
18 Q.   Did you have any other interviews
19 other than at Liberty Home Health and
20 Philadelphia Community College?
21 A.   I had one interview at Temple for,
22 uhm, in their Inside-Out Program.
23 Q.   Did you receive that job?
24 A.   No, I did not.

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1   Q.   Were you informed somebody else
2   received the job?
3   A.   I did.
4   Q.   Any other interviews you've had since
5   the end of your employment at Temple?
6   A.   It was with Dick Blick Art Store.
7   Q.   Which art store?
8   A.   Dick Blick Art Store.
9   Q.   Where is that?
10 A.   It's on Chestnut and Broad, I think.
11 Yeah, Chestnut and Broad.
12 Q.   Did you receive that position?
13 A.   No, I did not.
14 Q.   Were you told somebody else was hired
15 for it?
16 A.   I did.
17 Q.   Any other interviews?
18 A.   No.
19   - - -
20   (Whereupon, Temple Application
21   Status, Bates No. BRIGGS 97-99, was
22   marked as D Exhibit No. 47 for
23   identification.)
24   - - -

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1　　　THE COURT REPORTER:
2　Forty-seven.
3　　　MS. FENDELL-SATINSKY: Can we
4　go off the record for a sec?
5　　　THE VIDEOGRAPHER: 6:37, off
6　the record.
7　　　- - -
8　　　(Whereupon, a brief recess was
9　taken from 6:37 until 6:37 p.m.)
10　　　- - -
11　　　THE VIDEOGRAPHER: 6:37, back
12　on the record.
13　BY MS. FENDELL-SATINSKY:
14　Q.　Ms. Briggs, have you seen this
15　document before?
16　A.　Online.
17　Q.　Okay. And I'll represent to you that
18　this is a document that you gave that your
19　attorney gave to us.
20　A.　Okay.
21　Q.　Okay?
22　A.　I must have printed it out then.
23　Q.　Uhm, if you look in the upper
24　right-hand corner of the three pages of this

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1　exhibit --
2　A.　Uh-huh.
3　Q.　-- it says 10/8/14.
4　　　Do you see that?
5　A.　I do see that.
6　Q.　And is -- you accessed this record
7　online; is that accurate?
8　A.　It's just our bid page. I mean, I'm
9　considered an -- I wasn't considered a
10　Temple employee, so I just went to their
11　website and bid on them.
12　　　So, I just printed it from there.
13　Q.　So you can access your record of the
14　jobs you applied for at Temple --
15　A.　Yes.
16　Q.　-- regardless of whether you're a
17　current or a former employee?
18　A.　Yes.
19　Q.　Uhm, so if you look on the first
20　page, it says "Application Status."
21　A.　Yes.
22　Q.　Do you see that?
23　A.　Yes, I do.
24　Q.　Okay. And so, uhm, there's some jobs

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1　on here for which you applied which indicate
2　you were not selected.
3　　　It indicates your application was
4　received for a senior administrative
5　specialist position. Do you see that?
6　A.　Uh, yeah.
7　Q.　And did you receive that position?
8　A.　No.
9　Q.　At the end there, it indicates a
10　tri-state regional coordinator. Do you see
11　that?
12　A.　Yes, I do.
13　Q.　And it says "interviewed but not
14　selected."
15　A.　Yes.
16　Q.　Do you see that?
17　A.　Yes.
18　Q.　And, uh, is that the job that you
19　referenced that you were interviewed for but
20　not selected?
21　A.　Yes, it is.
22　Q.　When was the last time you applied
23　for a job at Temple?
24　A.　Probably about two months ago.

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1　Q.　What job did you apply for?
2　A.　It was called, uhm, some -- it's to
3　be a per tender (ph) of patient at the
4　medical school. I forget what the title of
5　the position is.
6　Q.　So that was not through Temple
7　University.
8　A.　It was --
9　Q.　Was that through Temple Hospital?
10　A.　Temple Hospital.
11　Q.　And was that something that you hoped
12　to do in addition to your work at Liberty
13　Home Health?
14　A.　Because, yeah, because it's per diem,
15　as needed. This comes up that, that often.
16　Q.　And have you been selected for that?
17　A.　No, I have not. Actually, I got an
18　email saying I wasn't selected.
19　Q.　Did you have to interview for that?
20　A.　No.
21　Q.　Did you have to submit some kind of
22　application?
23　A.　Just, just you fill out your
24　application. And if it's up-to-date, you

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1 just submit what you have on there.
2 Q.   Okay.
3   - - -
4   (Whereupon, various Plaintiff
5 resumes, Bates No. BRIGGS 1-14, was
6 marked as D Exhibit No. 48 for
7 identification.)
8   - - -
9   THE COURT REPORTER:
10 Forty-eight.
11 BY MS. FENDELL-SATINSKY:
12 Q.   Ms. Briggs, these are copies of your
13 resumés that were produced to us from your
14 attorney. I want to go through the first
15 one.
16 A.   Okay.
17 Q.   Did you create these resumés?
18 A.   Yes.
19 Q.   Did anyone assist you in creating the
20 resumés?
21 A.   No.
22 Q.   Did you create them on a computer you
23 have at home?
24 A.   Yes.

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1 Q.   On the third paragraph under
2 "expertise," it says "excellent writing and
3 editing skills."
4 A.   Uh-huh.
5 Q.   Do you see that?
6 A.   Yes, I do.
7 Q.   Did anyone at Temple tell you that
8 you had excellent writing and editing
9 skills, or did you believe that?
10 A.   I believe that.
11 Q.   So nobody at Temple told you that,
12 correct?
13 A.   It was on some of my PDPs. I
14 don't -- my performance development.
15 Q.   So your testimony is that some of
16 your performance development plans or
17 performance reviews reference that you had
18 excellent writing and editing skills?
19 A.   I don't know if they used the term
20 "excellent writing and editing," but I ex --
21 I did -- that was one of my job functions.
22 Q.   Okay. But no one told you that you
23 had excellent writing and editing skills,
24 correct?

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1 A.   Only my professors.
2 Q.   And that was prior to your employment
3 at Temple?
4 A.   Yes.
5 Q.   Prior to working at Temple, you
6 worked at the Academy of Natural Sciences.
7 A.   That is correct.
8 Q.   Why did you leave the Academy of
9 Natural Sciences?
10 A.   I was laid off. It was academy-wide
11 layoffs.
12 Q.   Did you receive any discipline during
13 your employment at the Academy of --
14 A.   No.
15 Q.   -- Natural Sciences?
16 A.   I did not.
17 Q.   Let me finish my question.
18 A.   I'm sorry.
19 Q.   Did you receive any discipline during
20 your employment at the Academy of Natural
21 Sciences?
22 A.   No, I did not.
23 Q.   It looks like you did not obtain
24 employment at Temple for about two months

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1 after your layoff at the Academy of Natural
2 Sciences.
3 A.   Yes. That's true.
4 Q.   What did you do for money during that
5 time?
6 A.   I was living with, uh, my fiancé and
7 was able to find a job quickly.
8 Q.   Did you marry your fiance?
9 A.   No, I did not.
10 Q.   Did -- are you still together with
11 your fiancé?
12 A.   No, I am not.
13 Q.   When did your relationship with your
14 fiancé end?
15 A.   In 2004.
16 Q.   Prior to working at the Academy of
17 Natural Sciences, you worked at Pennsylvania
18 Home of the Sparrow?
19 A.   Correct.
20 Q.   Why did you leave that job?
21 A.   Because I got the job at the Academy
22 of Natural Sciences.
23 Q.   Did you receive any discipline during
24 your employment at Pennsylvania Home of the

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1 Sparrow?
2 A. No, I did not.
3 Q. Prior to Pennsylvania Home of the
4 Sparrow, you worked at Family Planning
5 Council?
6 A. Correct.
7 Q. Why did your employment at Family
8 Planning Council end?
9 A. Because the Pennsylvania Home of the
10 Sparrow recruited me and paid me more.
11 Q. Did you receive any discipline during
12 your employment at Family Planning Council?
13 A. No, I did not.
14 Q. Prior to Family Planning Council, you
15 worked at the Philadelphia College of
16 Osteopathic Medicine, correct?
17 A. Correct.
18 Q. Why did your employment at the
19 Philadelphia College of Osteopathic Medicine
20 end?
21 A. Because the hospital was -- is gone.
22 They took it away, so anybody that was in
23 the health, delivering healthcare, was gone.
24 So it's just a medical school now.

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1 Q. Was it a termination or a layoff, or
2 do you not know?
3 A. I was part-time, so I guess it
4 wouldn't be considered a layoff.
5 Q. Uhm, during that time, did you have
6 any other employment?
7 A. No. I was full-time -- well, I had
8 children, small children.
9 Q. You were part-time, though, at
10 Philadelphia College of Osteopathic
11 Medicine, correct?
12 A. Yes. I did teach occasionally in
13 between, I can remember at that time, at
14 different hospitals, but...
15 Q. Between December 1994 when your
16 employment at Philadelphia College of
17 Osteopathic Medicine ended and September
18 1995 when you started working at Family
19 Planning Council, what did you do for money?
20 A. I was married.
21 Q. And so did you rely on your spouse
22 for income?
23 A. Yes.
24 Q. Have you had any other employment

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1 other than the employment that's reflected
2 on D-48 other than your employment -- your
3 current employment?
4 A. Yes.
5 Q. What other employment have you had
6 that's not reflected on D-48 other than your
7 current employment?
8 A. I mean, all the -- how far back do
9 you want me to go?
10 Q. Well, my first --
11 A. I don't, I don't -- I was -- had jobs
12 before.
13 Q. Have you had any other employment
14 since 1991 other than what's listed on your
15 resume except for your current position?
16 A. Yes.
17 Q. What other employment have you had
18 since 1991?
19 A. I was a maternal child health
20 educator. I worked at Bryn Mawr Hospital,
21 Einstein Hospital, Bryn Athyn Birth Center.
22 Q. When did you hold that job?
23 A. That would have been 1990 to 1991.
24 Q. Was that part-time?

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1 A. Yes; very part-time.
2 Q. Any other jobs that you had that are
3 not reflected on your resume?
4 A. Before I had kids, I did. I worked
5 in Baltimore. I worked in restaurants. I
6 worked in banks.
7 Q. Was that since 1991?
8 A. Oh, no, no, no.
9 Q. Okay. Have you had any other
10 employment --
11 A. No, not since 19 --
12 Q. -- 1990 --
13 A. No.
14 Q. Let me finish my question.
15 A. Okay.
16 Q. Have you had any other employment
17 since 1991 other than what's reflected on
18 your resumés with the exception of your
19 current job?
20 A. Those two child birth education ones,
21 Bryn Athyn -- Bryn Mawr and, uhm, Einstein.
22 Q. But nothing else, correct?
23 A. Correct.
24 Q. When did you begin treating with

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1 Dori Middleman?
2 A.   Uhm, 1997 or '08.
3 Q.   And that was prior to your employment
4 at Temple, correct?
5 A.   It was.
6 Q.   When did you last treat with
7 Dr. Middleman?
8 A.   I see her every six months. The last
9 time was four months ago.
10 Q.   Was there something in 1997 or 1998
11 that prompted you to seek treatment from
12 Dr. Middleman?
13 A.   The death --
14   MR. MUNSHI: Just say "yes" or
15   "no."
16   THE WITNESS: Yes.
17 BY MS. FENDELL-SATINSKY:
18 Q.   And what was that?
19 A.   The death of my mother, my father,
20 and my sister.
21 Q.   At that time, did Dr. Middleman give
22 you any diagnosis?
23 A.   Adjustment disorder, I think was...
24 Q.   Are you aware of any other diagnosis

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1 that Dr. Middleman has given you?
2 A.   Yes, I am.
3 Q.   What else?
4 A.   Posttraumatic stress disorder.
5 Q.   And when did --
6 A.   And major depression.
7 Q.   When did she diagnose you with
8 posttraumatic stress disorder?
9 A.   When I first started seeing her.
10 Q.   In 1997 or '98?
11 A.   '97 or '98, yeah.
12 Q.   And when did she diagnose you with
13 major depression?
14 A.   Same time.
15 Q.   1997 to --
16 A.   Uh-huh.
17 Q.   -- 1998?
18 A.   Uh-huh.
19 Q.   Is that correct?
20 A.   Yes, that is correct.
21 Q.   Did she prescribe you medication in
22 1997 or 1998?
23 A.   She actually helped me get off of
24 medication that had been prescribed to me.

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1 Q.   What medication had been prescribed
2 to you?
3 A.   Prozac, an anti -- I don't remember
4 the names of all of them. Antianxiety
5 medication, a sleep medication.
6 Q.   Who had prescribed those medications
7 to you?
8 A.   Dori Middleman. Oh, the ones before
9 that? It was another doctor I'd seen for
10 the same thing.
11 Q.   Who was that doctor?
12 A.   His name was "Boyadjis." I can't
13 remember his first name. B-O-Y-A --
14 Q.   Where was he located?
15 A.   He was located in one of those mental
16 health places where every time you go in you
17 see a different person, so I -- and they've
18 disbanded. I don't even know if they're
19 around anymore.
20 Q.   So I asked you if Dr. Middleman
21 prescribed you any medication in 1997 or
22 1998 when you first saw her, and you said
23 she helped you get off prior medications you
24 had been on.

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1 A.   That is true.
2 Q.   Did -- at any point, has
3 Dr. Middleman prescribed you medication?
4 A.   Yes.
5 Q.   Okay. When did she first prescribe
6 you medication?
7 A.   I'm going to say like '99.
8 Q.   And what medication did she prescribe
9 for you?
10 A.   It was Wellbutrin.
11 Q.   Did you know what she prescribed that
12 for?
13 A.   Depression.
14 Q.   Has she prescribed you any other
15 medication?
16 A.   Uhm, yes.
17 Q.   What other medication has she
18 prescribed to you?
19 A.   Klonopin.
20 Q.   Anything else?
21 A.   I don't know the names. I mean, I've
22 been on a couple things, but not for long
23 periods of time. I don't --
24 Q.   Are you currently on medication from

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1 Dr. Middleman?
2 A. Yes, I am.
3 Q. Okay. What medications are you
4 currently on?
5 A. I'm on Klonopin; an antidepressant
6 that I can't remember the name; uhm -- I
7 can't remember the name. I'm sorry.
8 Q. So Klonopin; an antidepressant that
9 you can't remember the name of.
10 A. Right.
11 Q. Is there another medication?
12 A. I don't know why this is relevant.
13 Oh, my God.
14   MR. MUNSHI: Just do the best
15   that you can.
16   THE WITNESS: I can't remember
17   the names. I'm sorry.
18 BY MS. FENDELL-SATINSKY:
19 Q. How many medications are you on right
20 now that have been prescribed by
21 Dr. Middleman?
22 A. Three.
23 Q. Okay. So Klonopin, an
24 antidepressant, and then there's a third

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1 that you can't remember?
2 A. Right.
3 Q. When did she first prescribe you
4 Klonopin?
5 A. Back when I first started seeing her.
6 Q. And have you remained on Klonopin
7 since then?
8 A. Yes, I have.
9 Q. Do you have an understanding of why
10 she's prescribed you Klonopin?
11 A. Anxiety.
12 Q. When did Dr. Middleman prescribe you
13 the antidepressant that you can't remember
14 the name of?
15 A. Uhm, that was recently. Uhm, four
16 months ago.
17 Q. And the third medication that you
18 can't remember the name of, when did
19 Dr. Middleman prescribe that to you?
20 A. I'm going to guess early '90 -- I
21 mean early 2000. Like, 2001, 2002,
22 something.
23 Q. Is that an estimate or a guess?
24 A. It's a guess. I mean, it was in -- I

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1 don't...
2 Q. Following the end of your employment
3 at Temple, did Dr. Middleman prescribe you
4 any other medications other than those you
5 were already prescribed and the
6 antidepressant you can't remember the name
7 of?
8 A. That's the only one, yeah.
9 Q. And that antidepressant you can't
10 remember the name of, she --
11 A. I --
12 Q. -- she prescribed you the last time
13 you saw her?
14 A. Four months ago. Yes.
15 Q. And you see her every six months; is
16 that correct?
17 A. Yes, correct.
18 Q. How long have you been -- have you
19 been seeing her every six months since you
20 first treated with her?
21 A. Yes.
22 Q. Have you ever applied for disability
23 benefits?
24 A. No, I have not.

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1   MS. FENDELL-SATINSKY: I think
2   I'm just about done. Let's take a
3   quick break.
4   THE VIDEOGRAPHER: 6:54, off
5   the record.
6   - - -
7   (Whereupon, a brief recess was
8   taken from 6:54 until 7:00 p.m.)
9   - - -
10   THE VIDEOGRAPHER: 7:00 p.m.,
11   back on the record.
12   MS. FENDELL-SATINSKY: Ms.
13   Briggs, I just have a few more
14   questions for you.
15   - - -
16   (Whereupon, Plaintiff's
17   response to Defendant's First Set of
18   Interrogatories was marked as D
19   Exhibit No. 49 for identification.)
20   - - -
21 BY MS. FENDELL-SATINSKY:
22 Q. Ms. Briggs, these are the Responses
23 to Interrogatories that you sent to us.
24 Look at the last page, the second to last

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1 page.
2 A.   (Witness complies with request.)
3 Q.   Is that your signature?
4 A.   Yes, it is.
5 Q.   And before you signed these
6 interrogatories, did you review them?
7 A.   Yes, I did.
8 Q.   And did you believe they were
9 accurate?
10 A.   Yes, I did.
11 Q.   I want to go back to D-46.
12 A.   On here (indicating)? On here
13 (indicating)?
14 Q.   I'm sorry. The Exhibit 46.
15   MR. MUNSHI: It's back.
16   THE WITNESS: Okay, okay.
17   Okay.
18 BY MS. FENDELL-SATINSKY:
19 Q.   And in this letter, the second
20 sentence you wrote, "It was not until this
21 past Friday, April 18th, that I could
22 collect my personal belongings from my
23 office."
24   Do you see that?

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1 Q.   -- while you were in your office?
2 A.   Yes, he did.
3 Q.   And did you remove things from your
4 office that day?
5 A.   I did.
6 Q.   You testified earlier that you spent
7 the day on April 1st packing up your
8 belongings.
9 A.   Right.
10 Q.   Correct?
11 A.   And applying for Unemployment.
12 Q.   And applying for Unemployment, right?
13 A.   Uh-huh.
14 Q.   Why was there a need to go back to
15 the office on April 18th to collect your --
16 A.   Because I didn't --
17 Q.   Let me finish.
18 A.   Okay.
19 Q.   Why was there a need to go back to
20 your office on April 18th to collect your
21 belongings?
22 A.   Because I don't have a car, so I had
23 to wait for my daughter to have the time to
24 take me.

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1 A.   Yes, I do.
2 Q.   Did you go back to the office on
3 April 18th to -- did you go back to the
4 office on April 18th?
5 A.   I met Drew to get my stuff.
6 Q.   And so did Drew let you into your
7 office?
8 A.   Actually, Tom Stauffer is the one who
9 opened the office for me. He's the one that
10 had the key.
11 Q.   Who did you -- had you arranged that
12 previously --
13 A.   Yes.
14 Q.   -- with Tom?
15 A.   Yes, I had.
16 Q.   And, uhm, what did you tell Tom about
17 why you needed access to your office?
18 A.   To, to collect my belongings that I
19 couldn't take that night.
20 Q.   And then Tom let you into your
21 office?
22 A.   And he -- yes.
23 Q.   Did he stay there --
24 A.   He did.

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1 Q.   So did your daughter come up with you
2 to the office --
3 A.   No, she --
4 Q.   -- on April 18th?
5 A.   No, she did not.
6 Q.   Did she wait in the car?
7 A.   Yes, she did.
8 Q.   And then did you carry your
9 belongings down to the car?
10 A.   Tom and I did.
11 Q.   Other than picking up your boxes and
12 carrying them down to the car, is there
13 anything else you did in your office on
14 April 18th?
15 A.   No.
16 Q.   Have you ever been convicted of a
17 crime?
18 A.   No.
19 Q.   Is there anything that we haven't
20 talked about today that relates to your
21 claims in this litigation?
22 A.   Uhm, not that I'm aware of.
23 Q.   So in terms of your claims in this
24 litigation, you have told me everything that

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1 you believe relates to your claims; is that
2 correct?
3 A. That is correct.
4   MR. MUNSHI: Plus all the
5   documents that we looked at.
6   MS. FENDELL-SATINSKY: Plus
7   all the documents that we've
8   reviewed.
9 BY MS. FENDELL-SATINSKY:
10 Q. Ms. Briggs, as I've mentioned
11 throughout the deposition, there's some
12 documents that we don't have that you
13 testified you do have, and so I'm going to
14 leave the deposition open. Your attorney
15 and I will discuss that. Don't worry about
16 that, what that means, after today. Okay?
17 A. Okay.
18   MS. FENDELL-SATINSKY: Subject
19   to any questions your attorney may
20   have, I don't have any further
21   questions at this time.
22   MR. MUNSHI: I'm just going to
23   ask you a few -- oh, sorry.
24   I'm just going to ask a few

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1   questions.
2   THE WITNESS: Okay.
3   MR. MUNSHI: I don't want to
4   stay too much longer here.
5 BY MR. MUNSHI:
6 Q. Ruth, you mentioned earlier that you
7 took a class at Temple University; is that
8 right?
9 A. Yes.
10 Q. Do you recall how many classes you've
11 taken at Temple University?
12 A. I only -- this is the only one I
13 took.
14 Q. And --
15 A. Except for personal growths, but
16 those were sponsored by Temple.
17 Q. The one class you took, did you
18 register as a student?
19 A. Yes, I did.
20 Q. Okay. As a student, did you get a
21 Temple email address, if you recall?
22 A. Well, I would have. I already had
23 one, though.
24 Q. Is it your understanding that

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1 students at Temple get email addresses?
2 A. It is my understanding.
3 Q. Okay. And that course was in the
4 spring of 2014; is that right?
5 A. Yes, it was.
6 Q. Okay. You mentioned this earlier,
7 but we didn't really flush it out.
8   Did Dr. Wu ever yell at you to get
9 coffee for him?
10   MS. FENDELL-SATINSKY:
11   Objection. Asked and answered and
12   leading.
13   You can answer the question.
14   THE WITNESS: I can or I
15   can't?
16   MR. MUNSHI: Yeah.
17   MS. FENDELL-SATINSKY: Yes.
18   THE WITNESS: Okay. Yes.
19 BY MR. MUNSHI:
20 Q. So, tell us about that. Uhm, what do
21 you recall him saying to you and the tone of
22 it?
23 A. Uhm, you know, as I said, I was in
24 Walkman on the 10th floor and he -- when he

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1 had guests he would call me and ask me to
2 come down and make coffee and get cookies
3 for them. And I would go down and do it,
4 but there were two student workers there and
5 Judy Lennon was right there, and once again
6 I was distracted and pulled off my job,
7 so... But it happened all the time.
8 Q. Do you recall him yelling at you or
9 asking you politely?
10   MS. FENDELL-SATINSKY:
11   Objection. Leading.
12   Go ahead.
13   THE WITNESS: I mean,
14   occasionally he would ask kindly,
15   and other times he would demand and
16   yell.
17 BY MR. MUNSHI:
18 Q. How did that make you feel when he
19 made demands?
20   MS. FENDELL-SATINSKY:
21   Objection. Leading.
22   MR. MUNSHI: "How did that
23   make you feel" is leading?
24   MS. FENDELL-SATINSKY: When

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1   you said "demands" at the end. She
2   didn't testify that it was a demand.
3   MR. MUNSHI: She did say the
4   word "demand."
5   MS. FENDELL-SATINSKY: Well, I
6   can still object to the question.
7   MR. MUNSHI: Okay.
8   MS. FENDELL-SATINSKY: So why
9   don't you ask the question again.
10 BY MR. MUNSHI:
11 Q.   How did it make you feel to hear a
12 demand, a demand from Dr. Wu regarding
13 coffee?
14   MS. FENDELL-SATINSKY:
15 Objection to form and leading.
16   You can answer the question.
17   THE WITNESS: Uhm, it really
18 humiliated me when there are other
19 people around. And he would do it
20 in front of, like, distinguished
21 speakers or visitors, you know,
22 faculty candidates.
23 BY MR. MUNSHI:
24 Q.   How did it make you feel when he

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1   raised his voice at you?
2   MS. FENDELL-SATINSKY:
3   Objection to form.
4   BY MR. MUNSHI:
5   Q.   You can answer.
6   A.   Okay. Uhm, honestly, it frightened
7   me. I don't yell, I don't, I don't yell at
8   people, I don't -- not around people who
9   yell, and it was upsetting.
10 Q.   Did you ever hear him yell at a man
11 to get coffee?
12   MS. FENDELL-SATINSKY:
13 Objection. Leading.
14   THE WITNESS: No, I did not.
15   Oh, oh, was that right?
16   MR. MUNSHI: Unless we say
17 don't answer --
18   THE WITNESS: Oh, okay.
19   MR. MUNSHI: -- go ahead and
20 answer.
21 BY MR. MUNSHI:
22 Q.   You testified earlier to other people
23 who were in the office working under Dr. Wu.
24 There was Judy, Jackie; there were all these

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1   other people.
2   Q.   Do you remember --
3   A.   Yes.
4   Q.   -- listing all those names?
5   A.   Yes.
6   Q.   Okay.
7   MS. FENDELL-SATINSKY:
8   Objection. Leading.
9   BY MR. MUNSHI:
10 Q.   Do you know of any of those folks who
11 worked in the office for Dr. Wu besides
12 yourself who ever complained of
13 discrimination?
14 A.   No, I don't.
15 Q.   You've seen documents here today of
16 correspondence with Sandy, and I'm just
17 going to use their first names, Sandy,
18 Deirdre, Rhonda, Cameron, Fay.
19   And you testified a little bit as to
20 why you reached out to Cameron specifically
21 based on --
22 A.   Right.
23 Q.   -- your testimony there.
24   My question is more broadly and

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1   generally: Why did you reach out to anybody
2   in Human Resources or any other department
3   about Dr. Wu's conduct?
4   MS. FENDELL-SATINSKY:
5   Objection. Leading. Asked and
6   answered.
7   You can answer the question.
8   THE WITNESS: Okay. Now I
9   forgot what the question was.
10   Who -- what was the beginning
11 of your question?
12   MR. MUNSHI: Sure.
13 BY MR. MUNSHI:
14 Q.   You saw the correspondence that --
15 A.   Right.
16 Q.   -- was shown to you earlier.
17   My question is not with who you
18 reached out to specifically. My question
19 is: Why did you reach out to anybody in
20 Human Resources or Legal or EEO about
21 Dr. Wu's conduct?
22   MS. FENDELL-SATINSKY:
23 Objection. Leading. Asked and
24 answered.

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1   THE WITNESS: Uhm, I wanted --
2 I love Temple. I still miss it, and
3 I wanted it to make it work, so I --
4 when he was nice to me, I would just
5 act like nothing happened. And then
6 when he yelled at me, I would just
7 want to disappear, hide in my office
8 because I was so humiliated.
9   Is that the answer you -- was
10 that an answer?
11 BY MR. MUNSHI:
12 Q.   Putting this aside, any issues with
13 Dr. Wu or anybody else, did you enjoy
14 working at Temple?
15 A.   I love Temple.
16   MS. FENDELL-SATINSKY:
17 Objection. Leading.
18 BY MR. MUNSHI:
19 Q.   Did you enjoy working at Temple?
20 A.   I love -- I still love Temple. I'm a
21 Temple mom. I love the students; I miss
22 them. I loved the faculty.
23 Q.   Why did you continue to apply to jobs
24 at Temple after you were fired --

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1 A.   Because I wanted -- oh, I'm sorry. I
2 wanted to --
3   MS. FENDELL-SATINSKY:
4 Objection to form.
5   You can answer the question.
6   THE WITNESS: I wanted to stay
7 at Temple. I still love Temple.
8 BY MR. MUNSHI:
9 Q.   How has being terminated by Temple
10 affected you financially?
11   MS. FENDELL-SATINSKY:
12 Objection to form. Leading.
13   You can answer the question.
14   THE WITNESS: I went from
15 making 50-something, 50, 53 - I
16 can't remember exactly - to $20,000
17 a year; so instead of, you know,
18 enjoying a retirement, I've reached
19 a milestone. I qualify for public
20 housing and food stamps.
21   It's embarrassing. And I'm
22 facing eviction. I was hospitalized
23 in December. I have a $20,000
24 hospital bill that's my

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1 responsibility. I'm destitute. I
2 have become destitute. I'm close to
3 it, I should say.
4   And I don't, I don't want to
5 worry my children, so I tell them
6 very little. They didn't even know
7 that I lost my job for weeks.
8 BY MR. MUNSHI:
9 Q.   How did it make you feel to tell your
10 children that you lost your job?
11 A.   I was embarrassed. I let them down.
12 I mean, they were gone, but it changed my
13 relationship with my grandchildren. I
14 haven't had a Christmas tree since I was
15 fired. I haven't given my grandchildren
16 Christmas gifts or my children since I was
17 fired.
18   I'm sorry.
19   MS. FENDELL-SATINSKY: Do you
20 want to take a break?
21   MR. MUNSHI: I'm not going to
22 ask you any more questions, so...
23   MS. FENDELL-SATINSKY: I have
24 a few questions.

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1   THE WITNESS: Oh, okay.
2   MS. FENDELL-SATINSKY: I have
3 a few questions, so why don't we
4 take a break.
5   THE WITNESS: No, that's okay.
6 I'll go.
7   MS. FENDELL-SATINSKY: No, no.
8 I'd like to take a break, so we'll
9 take a quick break and then go back
10 on. I just have a handful of
11 questions.
12   THE WITNESS: Okay.
13   MS. FENDELL-SATINSKY: Okay.
14   THE VIDEOGRAPHER: The time is
15 7:14.
16   Off the record.
17   - - -
18   (Whereupon, a brief recess was
19 taken from 7:14 until 7:15 p.m.)
20   - - -
21   THE VIDEOGRAPHER: 7:15, back
22 on the record.
23 BY MS. FENDELL-SATINSKY:
24 Q.   Ms. Briggs, I just have a few

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1 follow-up questions.
2   Earlier today you testified that
3 Dr. Wu yelled at his students, correct?
4 A. Yes.
5 Q. Is that a "yes"?
6 A. Yes.
7 Q. Did he yell at male and female
8 students?
9 A. Yes.
10 Q. In response to a question from
11 Mr. Munshi, you indicated that you were
12 hospitalized in the end of 2016.
13   Did your hospitalization relate in
14 any way to your employment at Temple?
15 A. No.
16 Q. Did your hospitalization relate in
17 any way to the end of your employment at
18 Temple?
19 A. No.
20 Q. I understand that you maintained your
21 Temple email address as a Temple student.
22   Did you understand that after the end
23 of your employment at Temple that you were
24 only to be accessing your Temple email for

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1 Q. And you withdrew because of an
2 injury?
3 A. Well, I wouldn't have. I was -- I
4 think it was Risk Review said that I -- they
5 didn't -- wouldn't let me go back.
6 Q. Okay. Uhm, after that Thursday
7 class, did you go back to any other art
8 class at Temple?
9 A. No.
10   MS. FENDELL-SATINSKY: I don't
11 have any other further questions for
12 you today.
13   Thank you very much.
14   THE WITNESS: Thank you.
15   MR. MUNSHI: Thank you.
16   THE VIDEOGRAPHER: The time is
17 7:17. That concludes this video
18 deposition.
19   We are off the record.
20   - - -
21   (Witness excused.)
22   - - -
23   (Deposition adjourned at
24 approximately 7:17 p.m.)

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1 student purposes?
2 A. I didn't know that, but that's what I
3 did.
4 Q. The art class that you were in at
5 Temple, did you have to pay for that?
6 A. It was no tuition. It was my
7 benefit.
8 Q. When did that course end?
9 A. In May.
10 Q. And after May -- is that May 2014?
11 A. Yeah. But I was made -- I had to, I
12 had to withdraw. I had hurt my finger the
13 night before I was fired, and Greg contacted
14 counsel and said -- our Risk Review, I think
15 it was, and they said that I couldn't go
16 back to class, said I was, you know, a risk.
17 Q. What kind of art class was it?
18 A. It was, uhm, metal. It was metal
19 sculpture fabricating.
20 Q. So did you attend any classes after
21 the end of your employment at Temple?
22 A. I went to the Thursday class
23 afterwards just to say -- tell the professor
24 why I had to withdraw.

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1
2   CERTIFICATE
3
4
       I HEREBY CERTIFY that the
5 witness was duly sworn by me and that the
   deposition is a true record of the testimony
6 given by the witness.
7   It was requested before
   completion of the deposition that the
8 witness, RUTH V. BRIGGS, have the
   opportunity to read and sign the deposition
9 transcript.
10
11
       Debra Anne Gerstemeier,
12   Registered Professional Reporter,
       Notary Public
13   Dated: May 25, 2017
14
15
16
17
18   (The foregoing certification
19 of this transcript does not apply to any
20 reproduction of the same by any means,
21 unless under the direct control and/or
22 supervision of the certifying reporter.)
23
24

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INSTRUCTIONS TO WITNESS

1
2
3   Please read your deposition
4   over carefully and make any necessary
5   corrections. You should state the reason in
6   the appropriate space on the errata sheet
7   for any corrections that are made.
8   After doing so, please sign
9   the errata sheet and date it.
10   You are signing same subject
11 to the changes you have noted on the errata
12 sheet, which will be attached to your
13 deposition.
14   It is imperative that you
15 return the original errata sheet to the
16 deposing attorney within thirty (30) days of
17 receipt of the deposition transcript by you.
18 If you fail to do so, the deposition
19 transcript may be deemed to be accurate and
20 may be used in court.
21
22
23
24

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ACKNOWLEDGMENT OF DEPONENT

1
2
3   I,_____, do
4   hereby certify that I have read the
5   foregoing pages, 1 - 523, and that the same
6   is a correct transcription of the answers
7   given by me to the questions therein
8   propounded, except for the corrections or
9   changes in form or substance, if any, noted
10 in the attached Errata Sheet.
11
12
13 _____
14 RUTH V. BRIGGS   DATE
15
16
17
18 Subscribed and sworn
    to before me this
19 _____ day of _____, 20____.
20 My commission expires:_____
21
    _____
22 Notary Public
23
24

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1   - - -- - -
          E R R A T A
2   - - - - - -
3   PAGE LINE CHANGE
4   ____ ____ _____
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24 ____ ____ _____

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